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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD.)	
)	Case No.: 3:19-cv-1671-BR
Plaintiff,)	
)	IN ADMIRALTY
v.)	
)	JOINT STATUS REPORT AND
Amis Integrity S.A. in personam and)	CASE SCHEDULE
M/V AMIS INTEGRITY (IMO)	
9732412) her engines, freights, apparel,)	
appurtenances, tackle, etc., <i>in rem</i> ,)	
)	
Defendant.		

Pursuant to the Court's March 23, 2019 Order (Doc. 37), the parties hereby submit the following Joint Status Report and Case Schedule.

1. At the present, the parties are conferring regarding a motion on the issue of counter security;
2. The parties will exchange initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on the date set forth below; AMIS INTEGRITY (hereinafter "AI") will respond to the Interrogatories

previously served on AI on Monday, October 21st, and produce the documents requested therein, including a copy of the charter party/Fixture Note for the chartering of the Vessel after it was withdrawn by AI from 24 Vision's service by November 15, 2019;

3. Either party can request additional discovery at any time, irrespective of the time for serving initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1). Such additional discovery to be produced within 30 days after receipt of a discovery demand from the party requesting the additional discovery and otherwise comply with the Federal Rules of Civil Procedure;
4. Either party can ask for the deposition of any witness(es) identified in the discovery materials who are either the other party's employees or under its control and who were involved in the transactions at issue or who possess relevant and material knowledge of the facts of the dispute. The number of witnesses to be deposed will initially be limited to three (3) per each side, unless more witnesses are ordered by the Court upon a showing of good cause for such additional witness(es);
5. The dates and venue of the depositions to be mutually agreed by the parties in accordance with LR 30-2. Such depositions shall ordinarily be taken and completed within 45 days of any Notice of Deposition that is served upon counsel for the respective parties, unless such time is extended by a Stipulation of the parties or so Ordered by the Court. If the parties cannot agree, the parties agree to submit the matter to the Court on an expedited basis in accordance with LCR 7-1(g), with a response due within 3 days after service of the motion, and a reply due within 2 days after service of the response;
6. The parties will submit a joint status report to the Court every 30 days of the progress of the above discovery;

Activity	Proposed Date
Initial Disclosures	November 13, 2019
Close of discovery	April 30, 2020 ("Trigger Date")
Opening expert reports ¹	2 months after Trigger Date
Responsive expert reports	3 months after Trigger Date
Close of expert discovery	5 months after Trigger Date
Deadline to file dispositive motions	6 months after Trigger Date
Proposed pretrial order	7 months after Trigger Date

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

DATED October 30, 2019

By: /s/ David R. Boyajian

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Attorneys for Plaintiff Dry Bulk Singapore Ptd. Ltd.

¹ In the event that the parties agree and stipulate that no expert discovery is needed in this case, they may submit a proposed order requesting a change to shorten the case schedule without the good cause showing required under LR 16-3

LE GROS, BUCHANAN & PAUL

DATED October 30, 2019

By: /s/ Markus B.G. Oberg

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